

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Kevin Bryant,	)	C.A. No.: 6:14-cv-03468-TMC
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Aetna Life Insurance Company, and	)	
The Boeing Company	)	
	)	
Defendants.	)	
	)	

---

**PLAINTIFF'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

A. STATE THE FULL NAME, ADDRESS, AND TELEPHONE NUMBER OF ALL PERSONS OR LEGAL ENTITIES WHO MAY HAVE A SUBROGATION INTEREST IN EACH CLAIM AND STATE THE BASIS AND EXTENT OF SAID INTEREST.

**RESPONSE: None.**

B. AS TO EACH CLAIM, STATE WHETHER IT SHOULD BE TRIED JURY AND WHY.

**RESPONSE: This action is governed by the Employee Retirement and Income Security Act (ERISA), 42 U.S.C. §1001, *et seq.* and therefore should be heard non-jury.**

C. STATE WHETHER THE PARTY SUBMITTING THESE RESPONSES IS A PUBLICLY OWNED COMPANY AND SEPARATELY IDENTIFY: (1) EACH PUBLICLY OWNED COMPANY OF WHICH IT IS A PARENT, SUBSIDIARY,

PARTNER, OR AFFILIATE; (2) EACH PUBLICLY OWNED COMPANY WHICH OWNS TEN PERCENT OR MORE OF THE OUTSTANDING SHARES OR OTHER INDICIA OF OWNERSHIP OF THE PARTY; AND (3) EACH PUBLICLY OWNED COMPANY IN WHICH THE PARTY OWNS TEN PERCENT OR MORE OF THE OUTSTANDING SHARES.

**Response: Plaintiff is an individual.**

D. STATE THE BASIS FOR ASSERTING THE CLAIM IN THE DIVISION IN WHICH WAS FILED (OR THE BASIS OF ANY CHALLENGE TO THE APPROPRIATENESS OF THE DIVISION).

**Response: Plaintiff filed suit in the Greenville County Court of Common Pleas, and Defendant removed the case to this Division.**

E. IS THIS ACTION RELATED IN WHOLE OR IN PART TO ANY OTHER MATTER FILED IN THIS DISTRICT, WHETHER CIVIL OR CRIMINAL? IF SO, PROVIDE: (1) A SHORT CAPTION AND THE FULL CASE NUMBER OF THE RELATED ACTION, (2) AN EXPLANATION OF HOW THE MATTERS ARE RELATED; AND (3) A STATEMENT OF THE STATUS OF THE RELATED ACTION. COUNSEL SHOULD DISCLOSE ANY CASES WHICH MAY BE RELATED REGARDLESS OF WHETHER THEY ARE STILL PENDING.

**Response: No, this action is not related in whole or in part to any other matter filed in this district.**

Respectfully Submitted,

s/John Peace

John Robert Peace, Esq., Fed ID # 7411

John Robert Peace, PA

PO Box 8087

Greenville, SC 29604-8087

Ph: (864) 298-0500

Fax: (864) 271-3130

**Attorney for Plaintiff Kevin Bryant**

August 28, 2014